

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:
All Actions

**MOTION AND INCORPORATED MEMORANDUM OF LAW
TO SUBSTITUTE SILVERMAN/THOMPSON/SLUTKIN/WHITE LLC AS INTERIM
CO-LEAD COUNSEL LAW FIRM**

NOW COME the Plaintiffs, by and through the undersigned counsel, Stephen G. Grygiel, and move the Court to approve the substitution of Silverman/Thompson/Slutkin/White LLC (“STSW”), his current law firm, in place of Keefe Bartels, LLC, his former law firm, as one of the interim co-lead counsel for the Plaintiffs. In support of this Motion, the Plaintiffs state:

1. In its November 16, 2012 Memorandum Order, the Court granted the motion of plaintiffs represented by Keefe Bartels, LLC and others (“the Sossin Group”) for appointment of interim class counsel pursuant to Fed. R. Civ. P. 23(g). The undersigned had argued that motion for the Plaintiffs.

2. While at Keefe Bartels, Mr. Grygiel was the attorney solely responsible for the firm’s work on this case

3. While at Keefe Bartels, Mr. Grygiel personally performed the firm’s assignments for legal research, drafting, oral argument and court appearances.

4. When Mr. Grygiel left Keefe Bartels, Mr. Grygiel continued his representation of the Plaintiffs in association with Eichen, Crutchlow, Zaslow and McElroy, and with the other members of

the previously appointed Executive Committee, as Mr. Grygiel had done during his tenure at Keefe Bartels.

5. After leaving Keefe Bartels, Mr. Grygiel joined STSW.

6. STSW has substantial experience in large class actions. For example, STSW is interim Co-Lead Counsel in MDL No. 14-2551, *In re: National Hockey Players Concussion Injury Litigation* pending in the District of Minnesota. STSW is one of the two lead firms in the putative class action *Dent, et al. v. National Football League*, Case No. 3:14-CV-02324-WHA (now on appeal from the United States District Court for the Northern District of California to the United States Court of Appeals for the Ninth Circuit, No. 15-15143). STSW is also one of the two lead firms in the putative class action, *Etopia Evans, et al. v. Arizona Cardinals Football Club, LLC, et al.*, No. 1:15-cv-1457-WMN, pending in the United States District Court for the District of Maryland.

7. Keefe Bartels agreed to Mr. Grygiel's continued representation of the Plaintiffs. Keefe Bartels has had no role in the case since Mr. Grygiel's departure from Keefe Bartels.

8. STSW, a firm of 36 lawyers, has all the resources necessary to fulfill its role as one of the lead firms for the Plaintiffs and is committed to doing so.

9. Mr. Grygiel is a member in good standing of the Bar of this Court.

10. Mr. Grygiel has discussed this Motion with the other interim Co-Lead Counsel.

11. All of the other interim Co-Lead Counsel support this Motion.

12. Mr. Grygiel has discussed this Motion with counsel for the Defendant.

13. Counsel for the Defendant has authorized Mr. Grygiel to represent to the Court that the Defendant consents to this Motion.

DATED: February 12, 2016

RESPECTFULLY SUBMITTED

/s/ Stephen G. Grygiel

Stephen G. Grygiel

Del. Bar No.: 004944

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CERTIFICATE OF SERVICE

I, Stephen G. Grygiel, affirm that on this 12th day of February, 2016, I emailed and mailed hard copies of the foregoing Motion to Substitute Silverman/Thompson/Slutkin/White LLC as Interim Co-Lead Counsel Law Firm to the following:

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